

1 Michael R. Mordaunt, Esq., Bar No. 66911
2 Lori A. Reihl, Esq., Bar No. 246395
2 MORDAUNT, ROUNDY, REIHL & JIMERSON
3 A Professional Law Corporation
3 7488 Shoreline Drive, Suite B1
Stockton, CA 95219
4 Telephone: (209) 473-8732
Facsimile: (209) 957-9165
5 lreihl@mrrjlaw.com

6 Attorneys for Defendants
7 COUNTY OF SAN JOAQUIN
AND DOMINGO RAGASA, RN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

NORLAN PRUDENTE) Case No. 2:20-CV-00482-JAM-DB
12)
Plaintiff(s),)
13)
vs.)
14)
COUNTY OF SAN JOAQUIN and)
15 DOES ONE through TWENTY,)
inclusive.)
16)
Defendant(s).)
17)

Pursuant to the Status (Pre-Trial Scheduling) Order in this action, the initial deadline for expert disclosures was July 16, 2021 and supplemental disclosures was July 30, 2021. (See Docket No. 11.) Through Stipulations and Orders those deadlines were extended to August 16, 2021 for expert witness disclosures and August 30, 2021 for supplemental disclosure and disclosure of rebuttal witnesses. (See Docket Nos. 16-18.)

23 The parties have now completed the initial expert witness disclosures. However, based on
24 new issues raised in the disclosures and the availability of experts, defendant will require a short
25 extension of time to complete supplemental and rebuttal disclosures.

26 Therefore, the parties jointly request the Court extend the deadline for supplemental
27 disclosure and disclosure of any rebuttal experts to September 13, 2021.

Additionally, while expert disclosure deadlines have been extended in this case, the

1 discovery deadline set forth in the initial Pre-trial Scheduling Order has not, leaving insufficient
2 time to complete the remaining discovery, including expert discovery following the disclosures.
3 Therefore, parties also jointly request a 30 day extension on the discovery deadline to October 18,
4 2021.

5 SO STIPULATED.
6

7 Dated: 8/30/2021 KIM & ASSOCIATES

8 By: /s/ James Kim
9 James Kim, Esq.
10 Attorneys for Plaintiff
11 NORLAN PRUDENTE

12 Dated: 8/30/2021 LEADER-PICONE & YOUNG, LLP

13 By: /s/ Malcolm Leader-Picone
14 Malcolm Leader-Picone, Esq.
15 Attorneys for Plaintiff
16 NORLAN PRUDENTE

17 Dated: 8/30/2021 MORDAUNT, ROUNDY, REIHL & JIMERSON

18 By: /s/ Lori A. Reihl
19 Lori A. Reihl, Esq.
20 Attorneys for Defendants
21 COUNTY OF SAN JOAQUIN AND
22 DOMINGO RAGASA, RN

23 ///

24 ///

25 ///

26 ///

ORDER

IT IS HEREBY ORDERED that the deadline for supplemental disclosure and disclosure of any rebuttal experts shall be extended to September 13, 2021. The deadline to complete all discovery shall be extended to October 18, 2021.

Dated: August 30, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE